

ROBIN D. SHOFNER (272552)  
[shofner@mobolaw.com](mailto:shofner@mobolaw.com)

**MOBO LAW, LLP**

10280 Donner Pass Road  
 Truckee, California 96161  
 Tel: (530) 214-8700  
 Fax: (530) 214-8158

Attorneys for Mary McAlvain

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

<p><i>In re:</i></p> <p>PG&amp;E CORPORATION</p> <p>-and-</p> <p>PACIFIC GAS AND ELECTRIC COMPANY</p> <p style="text-align: center;">Debtors.</p> <p><input type="checkbox"/> Affects PG&amp;E Corporation</p> <p><input type="checkbox"/> Affects Pacific Gas &amp; Electric</p> <p><input checked="" type="checkbox"/> Affects Both Debtors</p> <p>All papers shall be filed in the Lead Case, No. 19-30088 (DM)</p>	<p>) <b>Case No.: 19-30088 (DM)</b></p> <p>) Chapter 11</p> <p>) (Lead Case)</p> <p>) (Jointly Administered)</p> <p>)</p> <p>) <b>DECLARATION OF MARY McALVAIN IN</b></p> <p>) <b>SUPPORT OF MOTION PURSUANT TO</b></p> <p>) <b>FEDERAL RULE OF BANKRUPTCY</b></p> <p>) <b>PROCEDURE 9006(b)(1) TO DEEM THE</b></p> <p>) <b>CLAIM OF MARY McALVAIN TIMELY</b></p> <p>) <b>FILED</b></p> <p>)</p> <p>) Date: August 23, 2022</p> <p>) Time: 10:00 a.m.</p> <p>) Dept.: To Be Held Telephonically</p> <p>) United States Bankruptcy Court</p> <p>) Courtroom 17</p> <p>) 450 Golden Gate Avenue, 16<sup>th</sup> Floor</p> <p>) San Francisco, CA</p> <p>) Judge: Honorable Dennis Montali</p> <p>)</p> <p>) <b>Objection Deadline: August 16, 2022</b></p> <p>)</p>
--	--

I, Mary McAlvain, declare and state as follows:

1. This Declaration is based upon my personal knowledge unless otherwise

1 indicated. If called upon to testify as to the matters stated herein, I could and would  
2 competently do so.

3 2. On the day of the Camp Fire, I was living at 1531 Judy Lane, Paradise,  
4 California, where I had resided for almost twenty-five (25) years.

5 3. I spoke several times on the phone with my niece about the smoke in the sky and  
6 we believed it was coming from Pulga and did not believe the fire would cross over Highway 70  
7 or make it to Oroville Lake and down the Feather River Canyon to Paradise. We kept a  
8 watchful eye on the news reports for evacuation orders for Zone 7 where I was located.

9 4. In the meantime, I checked on several of my neighbors to make sure they were  
10 aware of the situation.

11 5. I made plans with my niece that we would evacuate together as soon as we  
12 received the evacuation order. Shortly thereafter, I realized that Feather River Hospital was  
13 being evacuated, which was approximately one-and-a-half (1.5) miles from my home.

14 6. Zones 3 and 8, which bordered my location in Zone 7, were under mandatory  
15 evacuation orders. At this point I realized there were no sirens, no planes; just an eerie silence.  
16 Emergency vehicles were not on their way to offer assistance in evacuating even though there  
17 were falling embers, exploding propane tanks, and sparking power lines.

18 7. Due to the fast-moving fire and ferocious winds, my niece and I made the  
19 panicked decision to ditch our plans to evacuate together in order to save precious time, fearing  
20 for our safety and well-being.

21 8. Evacuation was arduous due to road closures, downed trees and electrical wires  
22 and general hysteria. I had to make a u-turn because treetops were on fire preventing safe  
23 travel; after forty-five (45) minutes I was only seven houses away from my home as it took  
24 forty-five (45) minutes to move three car lengths. The two-way street was filled with bumper-  
25 to-bumper cars five lanes wide, downed mailboxes, children and adults and dogs abandoning  
26 cars and running down the road. All traffic from Ponderosa Elementary School and Pentz Road  
27 and the hospital were in mass exodus simultaneously; the evacuation orders were failing.

28 9. It was during the evacuation that I realized that I would most likely not have a

1 home or a town to return to. I was thankful that I had more than half a tank of gas. It was only  
2 9:00 a.m. and the skies were full of smoke and as black as night.

3 10. The images I encountered on Clark Road were unbelievable. Don's Saw and  
4 Mower's business sign was aflame as well as dozens of lawnmowers, weed eaters and power  
5 saws and tools.

6 11. I was rear-ended during the evacuation and while trying to exchange information  
7 with the other driver, people were yelling at me and telling me to just keep moving so I got back  
8 in my car and kept moving.

9 12. It took another one-and-a-half (1.5) hours to get to Neal Road where the roadway  
10 widened allowing more traffic to move. Normally, this would have been a seven (7) to eight (8)  
11 minute drive but on the day of the Camp Fire it took over two (2) hours. I finally saw a short  
12 band of blue sky as I approached Highway 99; there was nothing but black in my rear-view  
13 mirror.

14 13. I finally arrived in Chico around noon, re-fueled, and drove to my friend's house  
15 with my pet dog. The situation intensified that afternoon and evening.

16 14. I drove to Santa Rosa the next day to stay with a different friend indefinitely. I  
17 had to borrow her clothes until I could go shopping as all I had was my pajamas and a pair of  
18 shoes. I lived with this friend for approximately six (6) weeks until I was able to find a rental.

19 15. My car was damaged from the heat, smoke, and ash and had to be replaced.

20 16. I lived in the rental for approximately six (6) months and then made the decision  
21 to move to Idaho in June 2019 in order to be closer to family. There was little hope for  
22 rebuilding and/or returning to Paradise. The entire town had been destroyed by fire; it was toxic  
23 due to water contamination and failed septic systems.

24 17. I developed PTSD and could barely manage my affairs. The amount of things  
25 requiring my attention were overwhelming such as the home insurance claim, replacing my car,  
26 and trying to adjust to my changed circumstances. I also developed high blood pressure and  
27 still suffer from post-traumatic stress disorder (PTSD) to this date.


28 18. I continue to have difficulty with managing daily tasks and have relied more and

1 more on my niece for assistance. I feel damaged and that my life has been altered forever. I am  
2 unable to function as well as I used to. It will be a continual process to heal from this loss;  
3 some days are better than others.

4 19. I had lost all hope until learning that I could request the Bankruptcy Court to  
5 allow me to file a late claim due to the emotional distress sustained by the fire when my niece  
6 contacted MOBO. It took me some time to draft this Declaration and gather the information to  
7 file the Proof of Claim as recounting the Camp Fire is still, and will likely always be, a source  
8 of sadness, distress, and anxiety for me.

9 I declare under penalty of perjury under the laws of the State of California and the  
10 United States that the foregoing is true and correct.

11  
12 Dated: June 30, 2022

13   
14 Mary McAlvain  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28